

**DEPARTMENT OF VETERANS AFFAIRS**  
**Justification and Approval**  
**For**  
**Other Than Full and Open Competition**

**1. Contracting Activity:** Network Contracting Office 16, Ridgeland, MS

**Agency:** Department of Veterans Affairs, South Central VA Health Care Network (VISN 16), Ridgeland, MS

- *Justification for Other Than Full and Open Competition.*
- *Purchase request (i.e. 2237) number:*

**2. Nature and/or Description of the Action Being Processed:**

The South Central VA Health Care Network is requesting a new sole source, firm-fixed price consultative contract for education and staff development with Creative Health Care Management's consultant, Ms. Donna Wright, RN, BSN, MS. The consultative service will be utilized for development of staff at 10 VISN 16 Medical Centers.

VHA and The Joint Commission require initial and ongoing competency assessment of all employees, including direct caregivers, non-direct caregivers, managers/supervisors, support staff, agency/contract employees, volunteers, and students. On May 24, 2012, the Deputy Under Secretary for Health for Operations and Management released a memo requiring Networks to ensure verification of competence of all personnel.

**3. Description of Supplies/Services Required to Meet the Agency's Needs:**

Description	Quantity	Total Cost	Estimated Period of Performance	Justification
16 hour onsite Competency Assessment Workshop and use of VTEL for non-traveler participation, 6 follow-up conference calls over 12-months, and 10 competency assessment books. The price is all inclusive of honorarium, travel, meals, and lodging.	1	~ \$13,000	Between January 2014 and September 2014	See above

**4. Statutory Authority Permitting Other than Full and Open Competition:**

( X ) (1) Only One Responsible Source and No Other Supplies or Services Will Satisfy

Agency Requirements per FAR 6.302-1;

**5. Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):**

In accordance with FAR 6.302-1, Ms. Donna Wright is the only responsible source for this highly specialized consultative service. Ms. Donna Wright consults exclusively through Creative Health Care Management located in Minneapolis, MN. She has outstanding credentials and is an expert in her field.

The Donna Wright Method of assessing competency has been implemented in VA health care centers throughout the nation and is the national method of choice. Ms. Wright is a nationally known expert on the competency assessment in health care. She has written four (4) books on the subject and many organizations have embraced the model of competency assessment that she has developed. In addition to giving us the ability to meet regulatory standards the model will promote accountability and clarity in the organization.

The model presented will assist each of the 10 medical centers in the following:

- Provide a clear understanding to differentiate between education, competence, and performance.
- Identifying initial core competencies for each job class and successful strategies for orientation
- Development of a system to identify ongoing competencies that reflect our organization's quality improvement needs.
- Create a system that promotes employee accountability
- Utilization of a competency process to motivate and recognize employees
- Learn the connection between competency assessment and performance review.

In addition to competency assessment and validation Ms. Wright has published and lectured across the nation on topics such as creative educational strategies, self-directed learning, creative approaches to mandatory training, creating a healthy work environment, and implementing shared governance.

Since Donna Wright is the author and founder of the "Donna Wright Method", soliciting similar consultative services from other vendors to teach the "Donna Wright Method" would be a substantial duplication of cost to the government that would not be recovered through competition. Seeking educators other than Donna Wright would also cause unacceptable delays in fulfilling VA requirements to implement a competency assessment tool, an annual standardized competency validation report and strategies for reasonable approaches to align competency reviews with annual performance reviews. Donna Wright has already developed assessment tools that have proven successful and meet the VHA and Joint Commission requirements.

**6. Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:**

In accordance with FAR 5.202 (a)(13), additional offers were not solicited for the proposed contract action due to the following:

- (i) Is for an amount not expected to exceed the simplified acquisition threshold;
- (ii) Will be made through a means that provides access to the notice of proposed contract action through the GPE; and
- (iii) Permits the public to respond to the solicitation electronically

**7. Determination by the Contracting Officer that the Anticipated Cost to the Government will be Fair and Reasonable:** According to the contracting officer, the anticipated cost will be considered fair and reasonable and provide the basis for this determination FAR Part 13.106(a).

Similar Education and Training events will be analyzed to ensure contract price is fair and reasonable.

**8. Description of the Market Research Conducted and the Results, or a Statement of the Reasons Market Research Was Not Conducted:**

Pursuant to FAR Part 10, minimal market research was undertaken to determine if sources capable of satisfying the agency's requirements exist and to determine if commercial items or non-developmental items are either available or can be modified so that they will satisfy the agency's needs.

Four research reports were found with multidimensional self-reporting tools designed for use with nurses in ongoing practice. Each tool specifies a unique set of dimensions of continuing competency (e.g., clinical care, leadership, interpersonal relationships) and has had its validity or reliability tested with practicing nurses. The results of the review showed an improvement in the development and availability of tools. However, the tools are still lacking in dimension and further investment in this area of research is needed.

There are multiple vendors that offer traditional competency assessment tools including HealthStream and the Learning Nurse Resource Network; however, traditional self-assessment competency models do not meet the needs of our organization. Wright's Outcome-focused/Accountability based approach ensures collaborative effort between managers and staff, proper evaluation of individual & group performance, compliance with regulatory standards, and ensures a means for problematic issues are monitored and addressed timely.

**9. Any Other Facts Supporting the Use of Other than Full and Open Competition:**

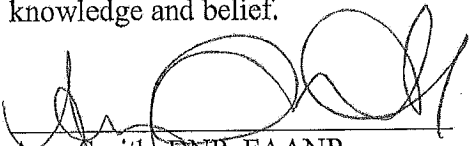
As noted above Ms. Wright is an expert in the field of competence assessment and has been consulted by numerous VA Medical Centers across the nation.

**10. Listing of Sources that Expressed, in Writing, an Interest in the Acquisition:** See section 6 above.

**11. A Statement of the Actions, if any, the Agency May Take to Remove or Overcome any Barriers to Competition before Making subsequent acquisitions for the supplies or services required:**

The expectation is that this will be a one time acquisition for services. No additional actions to foster future competition for future acquisitions are needed at this time.

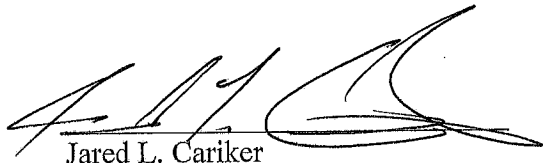
**12. Requirements Certification:** I certify that the requirement outlined in this justification is a Bona Fide Need of the Department of Veterans Affairs and that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

  
Amy Smith, DNP, FAANP  
Deputy Chief Medical Officer  
South Central VA Healthcare Network

12-16-13  
Date

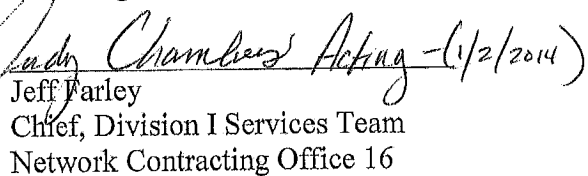
**13. Approvals in accordance with FAR 6.304**

**a. Contracting Officer's Certification: (required)** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

  
Jared L. Cariker  
Contracting Officer  
NCO 16 Division I Services Team

1/2/2014  
Date

**b. P&C:** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

  
Jeff Farley  
Chief, Division I Services Team  
Network Contracting Office 16

1-2-2014  
Date

**MEMORANDUM FOR RECORD**

15 Jan 2013

**SUBJECT:** Delegation of Authority: Other Than Full and Open Competition, Network Contracting Office (NCO) 16

**REFERENCE:** Standard Operating Procedure (SOP), Other than Full and Open Competition (OFOC) Procurements, Department of Veterans Affairs, VHA Procurement Manual, Volume VI, Chapter VI, dated 01 November 2012.

**1. Purpose:** The Network Contracting Office (NCO) 16 Chiefs of Procurement and Contracting are hereby Delegated the Authority to sign for their facilities the Justifications in the referenced SOP. In the absence of the Chief of Purchasing and Contracting, the Deputy Network Contract Managers (DNCM) may sign the Justifications.

**2. Policy:** Effective immediately, the following approvals for the Justifications are implemented in regards to the referenced listed above:

DOLLAR VALUE	J&A SIGNATURES REQUIREMENT
> \$3K BUT < \$150K	OFFICE CHIEF
> \$150 K BUT <\$500K	QA, NCM

3. All other signatures referenced within the SOP remain the same.

  
AARON VILLALPANDO  
NCO 16  
NETWORK CONTRACT MANAGER